



June 2, 2006

To: Mark Adelson
Senior Environmental Scientist
Santa Ana Regional Water Quality Control Board

Re: Draft Triennial Review Priority List

Dear Mr. Adelson,

Orange County Coastkeeper is pleased to submit the following comments on the issues identified on the Draft Triennial Review Priority list.

1. Item six to consider revisions to the SHEL beneficial use definition to not include human consumption should be dropped from the list. People have an expectation that they can consume the shellfish they legally take. Collecting and consuming shellfish is not a fringe activity and should be fully protected.
2. O. C Coastkeeper strongly supports items seven eight and nine and would like to see item eight receive higher priority
3. Item ten to remove site specific objectives for Cu, Cd, and Pb for the middle Santa Ana River reaches and their tributaries should be dropped from the list unless there is substantial recent data showing that these metals now meet CTR objectives in the areas affected.
4. Item eleven to revise the numeric objective for residual chlorine should only be considered to lower residual chlorine discharges.
5. O.C. Coastkeeper strongly supports the addition of beneficial uses outlined in item 13.1 and would like to see this item receive higher priority.
6. Item 13.2 the consider revising portions of Lytle Creek and the SAR to I-COLD should only be considered after a through temperature monitoring program has been completed as had been done for Mill Creek.
7. O.C. Coastkeeper strongly supports item 15 to add the listed waters to tables 3-1 and 4-1 and assign the appropriate WQS. These standards should include REC1 for all the listed waters. We would also like to see this item receive higher priority.
8. We support items seventeen and eighteen and would like them to receive higher priority.
9. O.C Coastkeeper strongly supports item twenty to clarify that WQ standards apply to intermittent waters and believe it should have a very high priority in the triennial review.
10. We support items twenty-two, twenty-five, twenty-six and twenty-seven and would like to see them receive higher priority.

Thank you for the opportunity to submit our comments. If you have any questions regarding the comments please give me a call and we can discuss them further.

Sincerely,

Raymond Hiemstra
Associate Director-Projects
Orange County Coastkeeper